

EXECUTIVE SUMMARY

SOURCE DESCRIPTION:

This source manufactures bowling balls composed of a polymeric blend of materials. The primary sources of emissions from this facility are the curing ovens, veneer and core pouring/curing, equipment cleaning and flushing, and the cold cleaning degreasers. The raw material storage tanks and buffing/drilling operations are considered insignificant activities. The only control equipment at the facility is a baghouse to control particulate emissions. The styrene and methylene chloride emissions do not have any control equipment associated with them and are therefore fugitive HAP emissions.

The facility's potential styrene emissions are 39.3 tons/year and potential methylene chloride emissions are 29 tons/year, therefore Ebonite International, Incorporated is being issued an operating Title V permit because their combined HAP's emissions are greater than 25 tons/year and because the facility was already in existence before the Title V program was initiated.

Based on the information provided, the Division concludes that Regulation 401 KAR 63:020 applies to the styrene processing units. And Regulations 401 KAR 63:021 and 401 KAR 63:020 apply to the MDI, and equipment cleaning (methylene chloride) processing units. Regulations 401 KAR 59:185, New solvent metal cleaning equipment and 401 KAR 63:002, National emissions standards for hazardous air pollutants, which incorporates by reference 40 CFR 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning, apply to the methylene chloride cold metal degreasers. Regulation 401 KAR 59:010 apply to the drilling, grinding, and buffing equipment and combustion units.

PUBLIC, AFFECTED STATE, AND U.S. EPA REVIEW:

On April 8, 2004, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in the *Kentucky New Era* in Hopkinsville, Kentucky. The public comment period expired 30 days from the date of publication. One set of comments was received from Ebonite International, Incorporated on May 17, 2004. Attachment B discusses these comments and the Division's responses. Minor changes were made to the permit as a result, however, in no case were any emissions standards, any monitoring, recordkeeping or reporting requirements relaxed. The U.S. EPA was notified, (via e-mail) of the issuance of the proposed permit on 8/9/2004.

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On December 15, 1998 the Division for Air Quality received a Title V operating permit application from Ebonite International, Incorporated to operate a bowling ball manufacturing facility in Hopkinsville, Kentucky. This application log # was 50734 and was determined to be complete on March 16, 1999.

The issuance of the Title V permit requires a preliminary determination and public notice. This has been done by the Division. An advertisement was placed in *Kentucky New Era* on April 8, 2004. The comment period expired on May 8, 2004. One set of comments was received from the company.

U.S. EPA has 45 days to comment on this proposed permit. The company will be notified if any changes are made to the final permit based on the U.S. EPA comments.

In conclusion, a thorough analysis has been made of all relevant information available, which pertains to this application. The Division for Air Quality has concluded that the operation of this facility will comply with all applicable regulatory requirements. Therefore, a determination has been made to issue a proposed permit, subject to the conditions listed in the permit.